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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANGELA D. SCOTT,)	
)	
Plaintiff,)	CASE NO.
)	2:23-cv-00888-CDS-NJK
v.)	
)	UNOPPOSED MOTION
)	FOR EXTENSION OF TIME TO FILE
KILOLO KIJAKAZI, ACTING)	PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	
)	

16 Plaintiff by her attorney, moves for a sixty-one (61) day extension of time to file
 17
 18 Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed on or before
 19 September 6, 2023. If this motion is granted, Plaintiff's deadline to file her Brief would be
 20 extended to November 6, 2023. This is Plaintiff's first request for an extension of time in this
 21 matter.

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 23 Counsel requests this extension due to the assigned briefing attorney unexpectedly
 24 leaving Counsel's office. Counsel has explored reassignment of this matter to a different
 25 briefing attorney, but is unable to do so by the current filing deadline due to the size of the
 26 Administrative Record (roughly 1,775 pages) and multiple, simultaneous filing deadlines.
 27 Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For
 28 instance, between September 1, and November 1, 2023, staff in Counsel's office have two

1 hundred and two (202) Plaintiff briefs due. This figure does not include Oral Arguments, appeals
2 to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise
3 throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to
4 properly prepare the brief by the current deadline. This request will not cause Defendant any
5 undue hardship. This extension is needed to thoroughly and properly prepare the brief.
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7 Wherefore, Plaintiff requests an extension from September 6, 2023, up to and including
8 November 6, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's
9 Counsel, who has no objection to this request.
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11 Dated September 1, 2023.

12 Respectfully submitted,

13 /s/Hal Taylor

14 Hal Taylor, Esq.

15 IT IS SO ORDERED.

16 Dated: September 5, 2023

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19 Nancy J. Koppe
United States Magistrate Judge
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